

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

IN RE: AQUEOUS FILM-FORMING FOAMS	)	Master Docket No.:
PRODUCTS LIABILITY LITIGATION	)	2:18-mn-2873-RMG

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CITY OF CAMDEN, et al.,	)	Civil Action No.:
	)	2:23-cv-03147-RMG
<i>Plaintiffs,</i>	)	
	)	
-vs-	)	
	)	
3M COMPANY,	)	
	)	
<i>Defendant.</i>	)	

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**PROPOSED CLASS COUNSEL’S CONSENT MOTION FOR EXTENSION OF TIME  
TO ALLOW RESPONSES TO PLAINTIFFS’ MOTION FOR PRELIMINARY  
APPROVAL OF CLASS SETTLEMENT**

Proposed Class Counsel with the consent of 3M move for a second extension of time for an additional two (2) days, until July 26, 2023, to allow certain States<sup>1</sup> and other interested parties to submit their responses to Plaintiffs’ Motion for Preliminary Approval.

When Proposed Class Counsel (with 3M’s consent) originally agreed to a 7-day extension for the States to respond to Plaintiffs’ Motion for Preliminary Approval of Class

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<sup>1</sup> Certain States – specifically, Colorado, Hawaii, Maine, Maryland, Massachusetts, Minnesota, New Jersey, New Mexico, Oregon, Rhode Island, Tennessee, Texas, Vermont and Wisconsin – filed a motion to extend the time to respond to the Plaintiffs’ Motion for Preliminary Approval of the Class Action Settlement between Public Water Systems and 3M [ECF No. 3405], to which several other interested persons then filed joinders. The Court recognized the States’ motion as well as “other states that join[ed] said motion,” granted the States’ motion in part to extend their time and then allowed the States’ objections, if any, to be filed on or before July 24, 2023 [ECF No. 3408].

Settlement, *i.e.*, until July 24, 2023 [ECF 3425], it was on the condition that if progress was being made to address legitimate concerns and if additional time would prove fruitful, Proposed Class Counsel would consider joining in another extension under such circumstances. The Court granted that request by Order dated July 17, 2023, but restricted the extension to file objections to on or before July 24, 2023 [ECF No. 3408].

Taking advantage of the Court's leave, Proposed Class Counsel can now report that several productive meet and confers have occurred over the past week and the prospect of achieving the goal of addressing concerns expressed by several States is bearing fruit. Proposed Class Counsel and 3M have exchanged ideas with the States about language that would satisfy the concerns that have been presented.

Given the productive nature of the discussions, Proposed Class Counsel and 3M submit that an additional two (2) day extension of time for responses to the Motion for Preliminary Approval, subject, of course, to the Court's approval, until July 26, 2023, would be beneficial to resolving the core issues raised by the States and the interested parties who joined their request for an extension of time. During this period, the undersigned intend to continue the ongoing discussions directed to the issues raised.

Wherefore, Proposed Class Counsel and 3M jointly submit that a 2-day extension of time, up to and including July 26, 2023, be allowed for the States and other interested parties to submit their responses to Plaintiffs' Motion for Preliminary Approval.

Dated: July 24, 2023

Respectfully Submitted,

s/ Michael A. London  
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*Proposed Class Counsel*

**CERTIFICATE OF**  
**SERVICE**

I hereby certify that a true and correct copy of the foregoing was electronically filed with this Court's CM/ECF on this 24th day of July, 2023 and was thus served electronically upon counsel of record.

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